

EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)	
)	No. 17-cv-05806-RJB
Plaintiff,)	
)	
vs.)	
)	
THE GEO GROUP, INC.,)	
)	
Defendant.)	
)	
)	

30(b)(6) DEPOSITION UPON ORAL EXAMINATION OF
COLLEEN MELODY
August 10, 2018
Fircrest, Washington

Taken Before:

Laura A. Gjuka, CCR #2057
Certified Shorthand Reporter

A P P E A R A N C E S

For the Plaintiff:

MARSHA CHIEN
LA ROND BAKER
Assistant Attorney General
Office of the Attorney General
800 Fifth Avenue, Suite 2000
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For the Defendant:

JOAN K. MELL
III Branches Law, PLLC
1019 Regents Boulevard
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Also Present:

ANYA PERRET

EXAMINATION INDEXEXAMINATION BY:PAGE NO.

Ms. Mell

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EXHIBIT INDEXEXHIBIT NO.DESCRIPTIONPAGE NO.

Exhibit No. 24

10 pages, Notice of Deposition

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Exhibit No. 25

2 pages, Various Emails, 2014

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1 BE IT REMEMBERED that on the 10th of August,
2 2018, 9:06 a.m., at 1019 Regents Boulevard, Fircrest,
3 Washington, before LAURA A. GJUKA, CCR# 2057, Washington
4 State Certified Court Reporter residing at University
5 Place, authorized to administer oaths and affirmations
6 pursuant to RCW 5.28.010.

7 WHEREUPON the following proceedings were had,
8 to wit:

9 * * * * *

10
11 COLLEEN MELODY, having been first duly sworn by
12 the Court Reporter, was examined and
13 testified as follows:

14
15 EXAMINATION

16 BY MS. MELL:

17 Q State your name for the record.

18 A Colleen Melody.

19 Q What's your address?

20 A My business address is 800 Fifth Avenue, suite 2000,
21 Seattle, Washington 98104.

22 Q Okay. What's your personal address?

23 MS. CHIEN: Objection. Is there a reason
24 you need her personal address?

25 MS. MELL: Not if you're going to accept

1 service if I need to --

2 THE WITNESS: Yes, we accept service
3 through our --

4 MS. CHIEN: Through the business address.

5 BY MS. MELL:

6 Q When you say "we accept service," if you're not there
7 and I need to subpoena you, the Attorney General's
8 office will accept service for you?

9 A Yeah.

10 MS. CHIEN: Yes.

11 BY MS. MELL:

12 Q Okay. And your phone number?

13 A (206) 464-5342.

14 Q And that's work?

15 A That's my direct line at work.

16 Q What is your position?

17 A I'm a unit chief for the civil rights unit at the
18 Washington State Attorney General's Office.

19 Q How many people are in the civil rights unit?

20 A Thirteen.

21 Q And who are those people comprised of? I don't need to
22 know their names, I just need to know what they do.

23 A They're attorneys and support staff that include
24 investigator, paralegal, legal assistant, staff members.

25 Q Who is the investigator?

1 THE WITNESS: The Attorney General's
2 office doesn't operate any detention facilities. So,
3 no, I don't have that information.

4 BY MS. MELL:

5 Q I know you've said that. But I want to find out
6 specifically whether or not Attorney General Ferguson
7 factored that into the analysis here applicable to this
8 case.

9 MS. CHIEN: Objection, work product,
10 attorney-client privilege.

11 THE WITNESS: The civil rights unit's
12 position, the Attorney General's Office position, is
13 that that's irrelevant. So it doesn't matter what the
14 staffing model is at a correctional facility. That's
15 not subject to the minimum wage statute that we're
16 enforcing. It wouldn't bear on our analysis --

17 BY MS. MELL:

18 Q How do you figure out who works there then? Attorney
19 General Ferguson has said he has got a parens patriae
20 interest in having Washington citizens work in the
21 facility. Who? How many people? How is that decided?

22 MS. CHIEN: Objection, misstates the
23 testimony.

24 THE WITNESS: You're talking about a
25 remedy? Are you asking what kind of --

1 A Because it's owned and -- the building, the land,
2 everything about it is owned by a private entity that
3 has entered in a contract with ICE so that it can make
4 money off the contract.

5 Q Who occupies it?

6 A Occupies it? I think -- I think some ICE staff work
7 there, GEO staff work there, detainee workers work
8 there, and detainees sleep and live there while they are
9 detained by the immigration statutes.

10 Q Do you know what the relationship is between the
11 Department of Corrections and the detention center,
12 Northwest Detention Center?

13 MS. CHIEN: Objection, beyond the scope.

14 THE WITNESS: Did you say Department of
15 Corrections?

16 BY MS. MELL:

17 Q Uh-huh.

18 A No.

19 Q Do you know that the state of Washington passed
20 legislation to use the Northwest Detention Center to
21 reduce its detention obligations?

22 MS. CHIEN: Objection, beyond the scope of
23 this deposition.

24 THE WITNESS: I don't know whether that's
25 true or not.

C E R T I F I C A T E

I, Laura Gjuka, a Certified Court Reporter in
and for the State of Washington, residing at
University Place, Washington, authorized to administer
oaths and affirmations pursuant to RCW 5.28.010, do
hereby certify;

That the foregoing Verbatim Report of Proceedings
was taken stenographically before me and transcribed
under my direction; that the transcript is a full, true
and complete transcript of the proceedings, including
all questions, objections, motions and exceptions;

That I am not a relative, employee, attorney or
counsel of any party to this action or relative or
employee of any such attorney or counsel, and that I am
not financially interested in the said action or the
outcome thereof;

That upon completion of signature, if required, the
original transcript will be securely sealed and the same
served upon the appropriate party.

IN WITNESS HEREOF, I have hereunto set my hand this
20th day of August, 2018.

Laura Gjuka, CCR No. 2057